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ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

“LILY,” “SARAH,” “SLOANE,” “CARA,”
“VIOLET,” “MARIA,” “JANE DOE” for
“SAVANNAH”, a protected person,
“HENLEY,” “PIA,” “MYA,” “ANGELA,”
“APRIL,” “MARTA SMITH,” guardian ad
litem for “JULIE,” a minor, “JANE,” “AMY,”
“JENNY,” “ERIKA,” “MARY MOE,” as next
friend for “RAVEN,” and “ANNA,”

Plaintiffs,

v.

DONALD VINCENT KELLER,

Defendant.

Case No: 6:25-cv-00078-MTK

**DECLARATION OF SUSANNA L.
SOUTHWORTH IN SUPPORT OF
PLAINTIFFS’ MOTION TO PROCEED
UNDER PSEUDONYMS**

DECLARATION OF SUSANNA L. SOUTHWORTH IN SUPPORT OF PLAINTIFFS’

MOTION TO PROCEED UNDER PSEUDONYMS

SUSANNA L. SOUTHWORTH hereby declares the following to be true and correct to
the best of my personal knowledge under penalty of perjury of the laws of the United States and
the State of Washington:

1. Though not attorney of record herein, I, as co-owner and partner of Restore the
Child, PLLC, represent Plaintiffs “Angela,” April,” and “Julie,” in all civil matters related to

DECLARATION OF SUSANNA L. SOUTHWORTH, PhD, JD
IN SUPPORT OF PLAINTIFFS’ MOTION TO PROCEED
UNDER PSEUDONYMS - 1

1 their status as child sex abuse victims. I make this Declaration in support of their motion to
2 proceed under pseudonyms.

3 2. I am an attorney licensed to practice law in the State of Washington since 2004. I
4 am fully competent to make this Declaration.

5 3. I and Restore the Child, PLLC, have represented “Angela,” April,” and “Julie,”
6 since 2022 in all matters related to their status as child sex abuse victims. In that regard, my
7 office received notice from the Benton County Sheriff’s Office Detective Christopher Dale that
8 “Angela,” “April,” and “Julie,” were victims of Defendant Donald Keller’s child pornography
9 offenses.

10 4. In Mr. Keller’s criminal case, and in all other proceedings relative to their status
11 as victims of child pornography crimes, the pseudonyms “Angela,” April,” and “Julie,” have
12 been used to protect their anonymity. No court has yet ordered that these Plaintiffs use their legal
13 name in any court proceeding.

14 5. Plaintiffs “Angela,” April,” and “Julie,” request permission to use pseudonyms
15 herein in order to protect themselves from harassment, injury, ridicule, personal embarrassment,
16 and exploitation by online predators.

17 6. In the course of my work representing victims of child sexual abuse material, I
18 have connected with the Canadian Centre for Child Protection Inc. (“Canadian Centre”) which
19 operates Cybertip.ca, Canada’s tipline for reporting the online exploitation of children, and
20 Project Arachnid, a web platform aimed at accelerating the removal of CSAM from the internet.
21 The Canadian Centre is aware, through its operation of Cybertip.ca, that some members of the
22 online offending community are interested in information about CSAM victims. For example, I
23 have been advised by employees of the Canadian Centre who work within the Cybertip.ca
24 program that they have personally seen online posts where one or more individuals comment on
25 a victim’s current whereabouts or post other identifying information. Examples of the
26 information posted include, the school or university a victim attends, the name of a sports team
27
28

29 DECLARATION OF SUSANNA L. SOUTHWORTH, PhD, JD
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1 to which a victim belongs, a victim's community involvement, or images involving a victim's
2 friends or acquaintances. I have also been advised by these same employees that online postings
3 of this nature tend to be found in dark web forums or within forums, chatrooms or platforms that
4 permit users to remain anonymous.

5 7. "Angela," "April," and "Julie," have suffered and continue to suffer from severe
6 psychological harm resulting from the child pornography-related crimes of which they were
7 victims. Plaintiffs suffer from, among other things, anxiety, depression, and chronic post-
8 traumatic stress disorder. They live in daily fear of being recognized and identified as the
9 individuals in the child sexual abuse images on the internet. Revealing their legal names to the
10 public, in any court proceeding, will put them in significant physical danger and risk additional
11 psychological harm.
12

13 DATED this 24th day of February, 2025, at Tacoma, Washington.

14
15 By: /s/ Susanna L. Southworth
16 Susanna L. Southworth, PhD, JD
17 WSBA No. 35687
18 **RESTORE THE CHILD, PLLC**
19 2522 N Proctor St, Ste 85
20 Tacoma, WA 98406
21 (253) 392-4409 susanna@restorethechild.com

22
23 *Attorneys for Plaintiffs "Angela," "April," and*
24 *"Julie."*
25
26
27
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing on:

John Kaempf, Esq.
Kaempf Law Firm PC
2021 SW Main Street, Suite 64
Portland, OR 97205
Phone: (503) 224-5006
Email: john@kaempflawfirm.com

by the following indicated method or methods:

- XX by mailing full, true, and correct copies thereof in a sealed, first-class postage-prepaid envelopes, addressed to the parties as shown above, the last-known office addresses of the parties, and deposited in the post office in Portland, Oregon on the date set forth below.
- ___ by electronic mail to the last-known e-mail address shown above on the date set forth below.
- ___ by causing full, true, and correct copies thereof to be hand-delivered to the parties at the parties' last-known office addresses listed above on the date set forth below.
- ___ by sending full, true and correct copies thereof via overnight courier in sealed, prepaid envelopes, addresses to the parties as shown above, the parties' last-known office addresses, on the date set forth below.
- ___ by faxing full, true and correct copies thereof to the parties at the fax numbers shown above, which are the last-known fax numbers for the parties' offices, on the date set forth below. The receiving fax machines were operating at the time of service and the transmissions were properly completed.
- ___ by personal delivery of a true copy of the foregoing to said attorney.
- X by Pacer e-File & Serve.

DATED this 24th day of February, 2025.

J. WILLIAM SAVAGE, P.C.

s/ J. William Savage
J. William Savage, OSB 773347
Of Attorneys for Plaintiff